



WISCONSIN

DEPARTMENT OF WORKFORCE DEVELOPMENT

Division of Economic Support

Bureau of Work Support Programs

**TO: Economic Support Supervisors
Economic Support Lead Workers
Training Staff
Child Care Coordinators
W-2 Agencies**

FROM: Stephen M. Dow
Policy Analysis & Program Implementation Unit
Work Programs Section

BWSP OPERATIONS MEMO

No.: 00-34

File: 2408

Date: 05/02/2000

Non W-2 ☐ **W-2** ☒ **CC** ☐

PRIORITY: High

**SUBJECT: W-2 – ELIGIBILITY FOR CUSTODIAL PARENT OF AN INFANT
PAYMENTS**

CROSS REFERENCE: W-2 Manual 7.4.0
Operations Memos 99-21 & 00-04

EFFECTIVE DATE: Immediately

PURPOSE

The purpose of this memo is to clarify the eligibility requirements for Custodial Parent of an Infant (CMC) placements and introduce new policy for subsequent placements for CMC participants who go immediately into unsubsidized employment from CMC.

BACKGROUND

The Wisconsin Works (W-2) program has four types of W-2 placements that allow cash payments to be provided to eligible participants: Trial Jobs (TJ), Community Service Jobs (CSJ), W-2 Transitions (W-2 T) and Custodial Parent of an Infant (CMC). While the first three (TJ, CSJ and W-2 T) are considered W-2 subsidized employment positions, CMC is not considered a W-2 employment position.

CURRENT POLICY

Current policy states that:

A custodial parent of a child who is 12 weeks old or less and who meets the financial and nonfinancial eligibility requirements for W-2 employment positions may receive a monthly payment of \$673 and will

not be required to participate in an employment position unless he/she volunteers to participate. A parent may only receive the custodial parent of an infant benefit if no other adult member of the custodial parent's W-2 group is participating or eligible to participate in a W-2 employment position or working in an unsubsidized job. (7.4.0, W-2 Manual).

This policy is based on § 49.148(1m), Wis. Stats.

ELIGIBILITY AND PLACEMENT IN A W-2 EMPLOYMENT POSITION

As is true for all W-2 employment positions, eligibility determination begins with meeting nonfinancial and financial eligibility requirements. The same is true for the Custodial Parent of an Infant (CMC) placement. However, once eligibility has been determined for a W-2 employment position, the FEP must then determine appropriate placement in one of the three subsidized employment positions or the unsubsidized employment rung of the W-2 ladder. This placement determination is based on a number of factors and the W-2 Manual provides general characteristics describing the types of individuals most suited for each employment position. Although the general characteristics are different for each employment position, our policies have always included reviewing work history, job preparedness, appropriateness for another rung of the W-2 ladder, etc., when determining appropriate placement.

This has not been the case for placement in the CMC payment. When determining appropriate placement in CMC, the following criteria must be considered:

- Having a child 12 weeks old or less
- Meeting nonfinancial and financial eligibility criteria
- Ensuring no other adult W-2 group member is in or eligible for placement in a W-2 employment position or working in an unsubsidized job.

Whether or not an individual is appropriate for placement in unsubsidized employment is a factor for placement in a W-2 employment position; however, that same standard is not appropriate for placement in CMC. It is expected that a single parent probably could not maintain full-time employment and care for a child less than 12 weeks at the same time. W-2 provides a placement for these single parents so they can stay at home and care for the child during the first few months of the child's life. This policy is based on the Family Medical Leave Act with the exception that the W-2 placement offers income support during the first 12 weeks of the child's life. At the end of the 12-week period, the single parent would be expected to join the workforce, just like other parents of young children or, if otherwise eligible, be placed in a W-2 employment position.

In addition, once the parent has been determined eligible for the CMC payment, the FEP can encourage the participant to volunteer for appropriate services such as parenting classes, budgeting classes, family planning services and, once appropriate, even job search. However, these services cannot be mandatory activities while the participant is in the CMC placement and whether or not an individual accepts these services must not be used as a basis for eligibility determination.

VERIFICATION

The W-2 agency must have verification from a participant of a child's birth prior to placing him or her into the CMC placement. Medical verification requiring the individual to be in the home for 12 weeks is not necessary.

CASE MANAGEMENT

During eligibility determination, if the FEP determines that placement in CMC will tick the individuals 24-month and 60-month clocks, the FEP must explain the impact this will have on the family's future W-2 benefits (See Operations Memo 99-21 for more detail on the CMC placement's impact on the time limits). Once the parent has been determined eligible for the CMC payment, the FEP can encourage the participant to volunteer for appropriate services such as parenting classes, budgeting classes, family planning services and, once appropriate, even job search. However, these services cannot be mandatory activities while the participant is in the CMC placement. All of this information should be documented in case comments and WPCH if appropriate.

NEW POLICY

Once a participant's child reaches 12 weeks of age, if the participant moves immediately into unsubsidized employment from the CMC placement, the FEP must offer the participant follow-up case management services regardless of nonfinancial and financial eligibility criteria. If the participant returns to work full-time and accepts follow-up services, he or she must be placed in CMF. If the participant does not accept case management services, the W-2 case should be closed. If the participant returns to work part-time, the FEP may consider placing the participant in a prorated CSJ placement, if appropriate as determined by an assessment.

There may be situations in which a CMC participant chooses to return to work *prior* to his or her child reaching 12 weeks of age. If the participant chooses to return to work part-time, again, the FEP may consider placing the participant in a prorated CSJ placement, if appropriate as determined by an assessment. If the participant chooses to return to work full-time and accepts case management follow-up services, he or she must be placed in CMF. If the participant does not accept services, the W-2 case should be closed.

In addition to providing important information regarding the individual's status, follow-up case management services can help participants make the necessary adjustments to be successful in the world of work while balancing the responsibilities of an infant. There are two other benefits to moving a CMC participant who obtains employment directly to CMF. First, the individual would be eligible for child care at the minimum co-payment amount for the first month (See Operations Memo 00-04 for more details). Second, if the CMC participant participated in activities and then finds or returns to unsubsidized employment, the CMF placement will have a positive impact on an agency's performance standards.

If the participant accepts follow-up case management services, the FEP must provide these services for at least 6 months to encourage and support job retention.